

# PREA Facility Audit Report: Final

**Name of Facility:** Northern Correctional Center

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 06/17/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Crystal Y. Norment	<b>Date of Signature:</b> 06/17/2024

AUDITOR INFORMATION	
<b>Auditor name:</b>	Norment, Crystal
<b>Email:</b>	crystal.norment@gmail.com
<b>Start Date of On-Site Audit:</b>	05/14/2024
<b>End Date of On-Site Audit:</b>	05/17/2024

FACILITY INFORMATION	
<b>Facility name:</b>	Northern Correctional Center
<b>Facility physical address:</b>	112 Northern Regional Correction Drive, Moundsville, West Virginia - 26041
<b>Facility mailing address:</b>	

Primary Contact
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<b>Name:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Shaun Straughn
<b>Email Address:</b>	shawn.t.shraughn@wv.gov
<b>Telephone Number:</b>	3048434067

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	Isabella Preston
<b>Email Address:</b>	Isabella.N.Preston@wv.gov
<b>Telephone Number:</b>	O: 304-843-4067

<b>Facility Health Service Administrator On-site</b>	
<b>Name:</b>	James Gray
<b>Email Address:</b>	jgray@wexfordhealth.com
<b>Telephone Number:</b>	304-843-4067 ext 123

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	627
<b>Current population of facility:</b>	630
<b>Average daily population for the past 12 months:</b>	212
<b>Has the facility been over capacity at any point in the past 12 months?</b>	Yes
<b>Which population(s) does the facility hold?</b>	Both females and males

<b>Age range of population:</b>	18-73
<b>Facility security levels/inmate custody levels:</b>	maximum
<b>Does the facility hold youthful inmates?</b>	No
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	166
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	35
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	78

#### AGENCY INFORMATION

<b>Name of agency:</b>	West Virginia Division of Corrections and Rehabilitation
<b>Governing authority or parent agency (if applicable):</b>	WV Department of Homeland Security
<b>Physical Address:</b>	1409 Greenbrier Street, Charleston, West Virginia - 25311
<b>Mailing Address:</b>	WV Division of Corrections & Rehabilitation, 1409 Greenbrier St., Charleston, West Virginia - 25311
<b>Telephone number:</b>	3045582036

#### Agency Chief Executive Officer Information:

<b>Name:</b>	William K Marshall III
<b>Email Address:</b>	William.K.Marshall@wv.gov
<b>Telephone Number:</b>	304-558-2036

#### Agency-Wide PREA Coordinator Information

<b>Name:</b>	Amanda McGrew	<b>Email Address:</b>	amanda.d.McGrew@wv.gov
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## Facility AUDIT FINDINGS

### Summary of Audit Findings

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

#### Number of standards exceeded:

0	
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#### Number of standards met:

45	
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#### Number of standards not met:

0	
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## POST-AUDIT REPORTING INFORMATION

### GENERAL AUDIT INFORMATION

#### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-05-14
2. End date of the onsite portion of the audit:	2024-05-17

#### Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	West Virginia Foundation for Rape Information and Services (WVFRIS) and Sexual Assault Center of West Virginia

### AUDITED FACILITY INFORMATION

14. Designated facility capacity:	630
15. Average daily population for the past 12 months:	614
16. Number of inmate/resident/detainee housing units:	31
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

**Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit**

**Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit**

<b>36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	614
<b>38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</b>	5
<b>39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</b>	50
<b>40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</b>	2
<b>41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</b>	4
<b>42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</b>	7

<p><b>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>5</p>
<p><b>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>13</p>
<p><b>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>2</p>
<p><b>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</b></p>	<p>No inmates identified as Limited English Speaking</p>
<p><b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b></p>	
<p><b>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</b></p>	<p>198</p>
<p><b>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b></p>	<p>78</p>

<p><b>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b></p>	<p>35</p>
<p><b>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>No text provided.</p>
<p><b>INTERVIEWS</b></p>	
<p><b>Inmate/Resident/Detainee Interviews</b></p>	
<p><b>Random Inmate/Resident/Detainee Interviews</b></p>	
<p><b>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>24</p>
<p><b>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b></p>	<p> <input type="checkbox"/> Age  <input type="checkbox"/> Race  <input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)  <input checked="" type="checkbox"/> Length of time in the facility  <input checked="" type="checkbox"/> Housing assignment  <input type="checkbox"/> Gender  <input type="checkbox"/> Other  <input type="checkbox"/> None </p>
<p><b>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b></p>	<p>Based on the housing unit rosters, I selected 9 from Jail, 9- from Prison, 6- from Ohio County</p>
<p><b>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b></p>	<p> <input checked="" type="radio"/> Yes  <input type="radio"/> No </p>



<b>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b>	none
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
<b>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	16
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<b>60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b>	2
<b>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b>	2
<b>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b>	1

<p><b>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>1</p>
<p><b>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>I asked random staff during their interview if they had any issues with an inmate who did not speak English as well as PCM stated that they did not have anyone.</p>
<p><b>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>3</p>
<p><b>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>2</p>

<p><b>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</b></p>	<p>2</p>
<p><b>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</b></p>	<p>1</p>
<p><b>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>none</p>
<p><b>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>none</p>

## Staff, Volunteer, and Contractor Interviews

### Random Staff Interviews

**71. Enter the total number of RANDOM STAFF who were interviewed:**

13

**72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)**

- Length of tenure in the facility
- Shift assignment
- Work assignment
- Rank (or equivalent)
- Other (e.g., gender, race, ethnicity, languages spoken)
- None

**73. Were you able to conduct the minimum number of RANDOM STAFF interviews?**

- Yes
- No

**74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):**

none

### Specialized Staff, Volunteers, and Contractor Interviews

Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.

**75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):**

13

**76. Were you able to interview the Agency Head?**

- Yes
- No

<b>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>78. Were you able to interview the PREA Coordinator?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>79. Were you able to interview the PREA Compliance Manager?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

**80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)**

- Agency contract administrator
- Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment
- Line staff who supervise youthful inmates (if applicable)
- Education and program staff who work with youthful inmates (if applicable)
- Medical staff
- Mental health staff
- Non-medical staff involved in cross-gender strip or visual searches
- Administrative (human resources) staff
- Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff
- Investigative staff responsible for conducting administrative investigations
- Investigative staff responsible for conducting criminal investigations
- Staff who perform screening for risk of victimization and abusiveness
- Staff who supervise inmates in segregated housing/residents in isolation
- Staff on the sexual abuse incident review team
- Designated staff member charged with monitoring retaliation
- First responders, both security and non-security staff
- Intake staff

	<input type="checkbox"/> Other
<b>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of VOLUNTEERS who were interviewed:</b>	2
<b>b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
<b>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of CONTRACTORS who were interviewed:</b>	3
<b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input checked="" type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
<b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	none

## SITE REVIEW AND DOCUMENTATION SAMPLING

### Site Review

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.

**84. Did you have access to all areas of the facility?**

Yes

No

**Was the site review an active, inquiring process that included the following:**

**85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?**

Yes

No

**86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?**

Yes

No

**87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?**

Yes

No

**88. Informal conversations with staff during the site review (encouraged, not required)?**

Yes

No



<p><b>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</b></p>	<p>none</p>
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**Documentation Sampling**

Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.

<p><b>90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</b></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
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<p><b>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</b></p>	<p>reviewed additional risk screening documents for initial and 30 day review and reviewed a sample in their inmate database to verify housing alerts as needed.</p>
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**SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY**

**Sexual Abuse and Sexual Harassment Allegations and Investigations Overview**

Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.

**92. Total number of SEXUAL ABUSE allegations and investigations overview during the 12 months preceding the audit, by incident type:**

	<b># of sexual abuse allegations</b>	<b># of criminal investigations</b>	<b># of administrative investigations</b>	<b># of allegations that had both criminal and administrative investigations</b>
<b>Inmate-on-inmate sexual abuse</b>	10	0	10	0
<b>Staff-on-inmate sexual abuse</b>	3	0	3	0
<b>Total</b>	13	0	13	0

**93. Total number of SEXUAL HARASSMENT allegations and investigations overview during the 12 months preceding the audit, by incident type:**

	<b># of sexual harassment allegations</b>	<b># of criminal investigations</b>	<b># of administrative investigations</b>	<b># of allegations that had both criminal and administrative investigations</b>
<b>Inmate-on-inmate sexual harassment</b>	7	0	7	0
<b>Staff-on-inmate sexual harassment</b>	7	0	7	0
<b>Total</b>	14	0	14	0

## Sexual Abuse and Sexual Harassment Investigation Outcomes

### Sexual Abuse Investigation Outcomes

Note: these counts should reflect where the investigation is currently (i.e., if a criminal investigation was referred for prosecution and resulted in a conviction, that investigation outcome should only appear in the count for “convicted.”) Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual abuse investigation files, as applicable to the facility type being audited.

#### 94. Criminal SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
<b>Inmate-on-inmate sexual abuse</b>	0	0	0	0	0
<b>Staff-on-inmate sexual abuse</b>	0	0	0	0	0
<b>Total</b>	0	0	0	0	0

#### 95. Administrative SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	0	2	7	1
<b>Staff-on-inmate sexual abuse</b>	0	1	1	1
<b>Total</b>	0	3	8	2

### Sexual Harassment Investigation Outcomes

Note: these counts should reflect where the investigation is currently. Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual harassment investigation files, as applicable to the facility type being audited.

**96. Criminal SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:**

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
<b>Inmate-on-inmate sexual harassment</b>	0	0	0	0	0
<b>Staff-on-inmate sexual harassment</b>	0	0	0	0	0
<b>Total</b>	0	0	0	0	0

**97. Administrative SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:**

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	0	0	6	1
<b>Staff-on-inmate sexual harassment</b>	0	0	7	0
<b>Total</b>	0	0	13	1

**Sexual Abuse and Sexual Harassment Investigation Files Selected for Review**

**Sexual Abuse Investigation Files Selected for Review**

**98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:**

6

<p><b>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p><b>Inmate-on-inmate sexual abuse investigation files</b></p>	
<p><b>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>3</p>
<p><b>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>Staff-on-inmate sexual abuse investigation files</b></p>	
<p><b>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>3</p>
<p><b>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p><b>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p><b>Sexual Harassment Investigation Files Selected for Review</b></p>	
<p><b>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>2</p>
<p><b>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p><b>Inmate-on-inmate sexual harassment investigation files</b></p>	
<p><b>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>2</p>
<p><b>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p><b>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

<b>Staff-on-inmate sexual harassment investigation files</b>	
<b>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	1
<b>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</b>	none
<b>SUPPORT STAFF INFORMATION</b>	
<b>DOJ-certified PREA Auditors Support Staff</b>	
<b>115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No

**Non-certified Support Staff**

**116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.**

- Yes
- No

**AUDITING ARRANGEMENTS AND COMPENSATION**

**121. Who paid you to conduct this audit?**

- The audited facility or its parent agency
- My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)
- A third-party auditing entity (e.g., accreditation body, consulting firm)
- Other

**Identify the name of the third-party auditing entity**

Diversified Corrections Consulting, LLC



<b>Standards</b>	
<b>Auditor Overall Determination Definitions</b>	
<ul style="list-style-type: none"> <li>• Exceeds Standard (Substantially exceeds requirement of standard)</li> <li>• Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period)</li> <li>• Does Not Meet Standard (requires corrective actions)</li> </ul>	
<b>Auditor Discussion Instructions</b>	
<p>Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.</p>	

<b>115.11</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.11</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00, Prison Rape Elimination Act Compliance</p> <p>WVDCR Organization Chart</p> <p>Northern Regional Corrections Facility Organization Chart</p> <p>INTERVIEWS:</p> <p>Agency Director</p> <p>Agency PREA Coordinator</p>

Facility Director

Facility PREA Compliance Manager

115.11 (a) (b) West Virginia Policy #430.00 is the main policy governing PREA compliance, and the West Virginia Department of Corrections & Rehabilitation

organizational charts meet the requirements of this standard. The agency's zero tolerance against sexual abuse is clearly established and the policy outlines the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment allegations. The policy establishes a position of Agency-Wide PREA Coordinator with the responsibility to oversee the implementation and management of Prison Rape Elimination Act of 2003. The facility PREA compliance manager under the direction of the Agency PREA Coordinator carries out their duties.

Northern Regional Corrections Center Superintendent has appointed a PREA compliance manager with responsibility to coordinate with the Agency PREA coordinator to oversee the implementation and management of the Prison Rape Elimination Act of 2003 for both Northern Regional Corrections Center and Ohio County Corrections Center. Both the agency PREA Coordinator and Facility Compliance Manager through interviews advised they have sufficient time and authority to coordinate efforts to comply with PREA standards.

The agency policies outline a zero-tolerance policy for all forms of sexual abuse and sexual harassment. Inmates are informed orally about the zero-tolerance policy and the PREA program during the in-take processing and also during orientation presentations.

Inmates are advised during Intake about PREA and the facility rules and regulations. They are advised to let staff know if they cannot read or understand the information. The information is offered in English and in Spanish in written formats. The auditor noted during the tour that written information regarding PREA was visible in all areas of the facility. All written documents are available in English and Spanish. Interpretive services are available for inmates with limited English speaking or reading skills. During random interviews staff and Inmates, and interviews with Contract and Volunteer staff it is determined that they received PREA training to include the mandatory duty to report and zero tolerance of sexual misconduct.

Based on auditor interviews and observations, and review of documentation, it is determined that the facility is in compliance with this standard.

<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 264 544 297"><b>Auditor Discussion</b></p> <p data-bbox="256 342 360 376">115.12</p> <p data-bbox="256 488 453 521">DOCUMENTS:</p> <p data-bbox="256 633 1123 667">Contract with McDowell County – Stevens Corrections Center</p> <p data-bbox="256 701 1286 734">Youth Services System, Inc – Ronald Mulholland Juvenile Center Contract</p> <p data-bbox="256 846 443 880">INTERVIEWS:</p> <p data-bbox="256 992 624 1025">Agency PREA Coordinator</p> <p data-bbox="256 1059 612 1093">Agency Contract Monitor</p> <p data-bbox="256 1205 1477 1406">115.12 The West Virginia Department of Corrections &amp; Rehabilitation (WVDCR) contracts with two private agencies who house their inmates. Youth Services System, Inc. manages the Ronald Mulholland Juvenile Center and McDowell County manages the Stevens Correctional Center. Both contracts require the private agency to comply with PREA standards and both agencies have successfully had PREA audits.</p> <p data-bbox="256 1518 1422 1585">Both facilities have been audited for compliance of PREA standards within the last three years and found to be compliant.</p> <p data-bbox="256 1697 1414 1776">Based on this information, the auditor has determined that the agency meets the requirements of this standard.</p>

<b>115.13</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard

**Auditor Discussion**

115.13

DOCUMENTS:

WVDCR Policy #430.00 – Prison Rape Elimination Compliance

Staffing Plan Northern Correctional Center/Ohio County

Unannounced Rounds Logs

INTERVIEWS:

Superintendent

Facility PCM

Higher-Level Staff

115.13 (a) (b) (c) (d) WVDCR policy requires the Superintendent along with the PREA Compliance Manager to review the staffing plan at least once a year. Interviews with the Shift Commander, Superintendent and PREA Coordinator and PREA Compliance Manager revealed compliance with the directive. The Shift Commander reviews the daily staffing rosters to ensure that staffing levels are met. Each Shift Commander must receive approval to vacate a post and that post must not be a critical post. The facility was short 55 staff and were using The National Guard to augment non-critical post up to the week of the audit. They had 83 new hires to fill the staff shortage. The audit included an examination of all video monitoring systems; staff interviews; and rosters. Supervisory and Administrative staff members make unannounced rounds covering all shifts and these rounds are documented through use of electronic log system. The unannounced rounds documentation received indicated that upper-level or higher-level staff made rounds on both shifts. Staff members are prohibited from alerting other employees regarding unannounced rounds because the shift commander does not log the round until after they are completed. Interview with Shift Commander indicated that he makes his rounds first and then tells the control officer to log it in the record as an unannounced PREA round to avoid them knowing. An examination of policy and supporting documentation and interviews with Higher-level Supervisors, and PREA Compliance Manager confirms that they have a written staffing plan and it has been reviewed along with the PREA Compliance Manager within the past year. The Staffing Plan was revised in January, 2023 and signed on

	<p>February, 2023. A comprehensive tour of the facility was conducted during the audit that included looking for blind spots, reviewing camera coverage and available staff in areas that inmates are assigned to work or live. The auditor found blind spots in the kitchen that a mirror can be added to cover that spot. The Superintendent and PREA Coordinator agreed and provided auditor a copy of the purchase order for the mirror. The auditor noted that the doors in the medical unit did not allow for privacy while using the toilet. The Superintendent and PREA Coordinator agreed to shadow the lower part of the window so inmates can not be seen using the toilet. The auditor looked at the control room cameras and found that those areas in food service would still benefit from a mirror being installed. The auditor advised Superintendent and PREA Coordinator that during inmate interviews, several inmates expressed concern about being able to be seen in shower from the stairs. The auditor went back to the housing units to observe, and it was noted that only one housing unit had a shower that could be seen from the stairs. The Superintendent and PREA Coordinator agreed to move the shower curtain to the top of the shower to prevent this. We also found that there was one unit that did not have curtains in the shower. The showers had half doors. The Superintendent and PREA Coordinator agreed to place shower curtains in each of those showers.</p> <p>Based on this information, the auditor has determined that Northern Regional and Ohio County are in compliance with this standard.</p>
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<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Northern Regional Corrections Center and Ohio County Corrections Center does not house Youthful Inmates.

<b>115.15</b>	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	115.15

DOCUMENTS:

WVDCR Policy #430.00 Prison Rape Elimination Compliance

Staff Training Attestation

Training Curriculum for Searches

INTERVIEWS:

Staff Interviews

Inmate Interviews

115.15 (a) (b) (c) (d) (e) (f) The above policy meet the mandates of this standard. Cross-gender strip or cross-gender body cavity searches are prohibited, except in emergency situations or when performed and documented by a medical practitioner. Officers would be required to document all cross-gender strip searches and cross-gender visual body cavity searches. Interviews with random staff confirmed that they were aware of the prohibition of visual body cavity or strip searches and cross gender pat searches of the inmates of the opposite sex except in exigent circumstances. Staff interviews and interviews with higher-level staff confirmed that Northern Regional or Ohio County prohibit all cross-gender searches and that it is not allowed within the State of West Virginia. Staff interviews indicated they received pat search training during initial and annual training. The auditor observed that each housing unit has shower curtains behind a half door for privacy with the exception of one unit did not have the shower curtains. They have been ordered. The facility has implemented a policy that all opposite gender staff working the units will announce themselves when they enter a unit and random inmate interviews confirmed that female staff are announced regularly prior to entering the housing unit. Random inmates were interviewed and acknowledged they were allowed to shower, and use the toilet without being viewed by staff of the opposite gender. The auditor observed the written notifications which stated Opposite Gender must announce prior to entering the unit. Staff interviewed were aware of the policy prohibiting the search of a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. During the past 12 months, there were no exigent circumstances that required cross-gender viewing of an inmate by a staff member.

Based on the review of policies and observations during the on-site visit to the housing units, and interviews with staff and inmates it has been determined that Northern Regional/Ohio County is in compliance with this standard.

<p><b>115.16</b></p>	<p><b>Inmates with disabilities and inmates who are limited English proficient</b></p> <hr/> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <hr/> <p>115.16</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>West Virginia Registry of Interpreters</p> <p>PGLS, LLC Document Translation Service</p> <p>Piedmont Global Language Service</p> <p>English/Spanish PREA Posters</p> <p>English/Spanish Handbook posted in Housing Units</p> <p>INTERVIEWS:</p> <p>Agency Head</p> <p>Facility Director</p> <p>Staff Interviews</p> <p>Inmate Interviews</p> <p>115.16 West Virginia Policy #430.00 outlines the agency’s requirements to effectively communicate with inmates with disabilities and language barriers. There were no inmates at Northern Regional/Ohio County with a language barrier identified during the on-site visit. Two (2) Inmates with physical disabilities indicated that they were able to read and understand the PREA information. Random and Targeted Inmate interviews revealed that they were knowledgeable about ways to report an allegation if needed. The auditor interviewed 2 inmates with a mental or cognitive disabilities, 3 with low vision, and 2 hard of hearing.</p>
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	<p>The agency maintains a contract with PGLS, LLC for Document Translation Service. They utilize Piedmont Global Language Service for interpretation services for languages other than English and the agency has a Brail translation program for those needing that service. Interviews with staff indicated that they are aware that they would use an interpreter if it was needed for a PREA report.</p> <p>Based on this information, it is determined that Northern Regional/Ohio County are in compliance with this standard.</p>
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<b>115.17 Hiring and promotion decisions</b>	
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>115.17</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>Background Checks</p> <p>PREA Self-Report</p> <p>INTERVIEWS:</p> <p>Agency PREA Coordinator</p> <p>Facility PREA Compliance Manager</p> <p>Human Resource Supervisor</p> <p>115.17 The auditor reviewed 37 sample background checks submitted for new hires and promotions and 5 year reinvestigations and found that they are completed every 4 years by hire date. The auditor reviewed the signed self-declaration for PREA included in the application packet. The state Background Unit also conducts the background checks for contract staff and volunteers.</p>



	Based on the review of sample documents and interviews, the auditor has determined Northern Regional/Ohio County is in compliance with this standard.
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<b>115.18 Upgrades to facilities and technologies</b>	
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.18</p> <p>DOCUMENTS:</p> <p>Facility Blueprints</p> <p>Facility Camera Plan</p> <p>WVDCR Policy #504.00 Tablet Program</p> <p>INTERVIEW:</p> <p>Facility Director</p> <p>Agency Head</p> <p>115.18 Northern Regional/Ohio County Corrections Center are two separate facilities. The Northern Regional Corrections Center has a female unit within the Jail and has a Prison and Jail side under one roof. Ohio County is one building with housing pods. There has been no new construction of either facility. Northern Prison side has 128 cameras, Northern Jail side has 128 cameras and Ohio County has 38 cameras.</p> <p>During the on-site visit, the auditor looked at the camera coverage from the control center and during the facility walk-through. The auditor did not note any areas that needed additional camera coverage to better facilitate a safe environment for the staff and inmates. The only new upgrades to technology is that they instituted a Tablet Program for the inmates.</p> <p>Based on this review, the auditor has determined that Northern Regional/Ohio County meet the requirements of this standard.</p>

<b>115.21</b>	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.21</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>West Virginia Protocol for Response to Victims of Sexual Assault (SARTS)</p> <p>MOU with West Virginia Foundation for Rape Information &amp; Service (WVFRIS)</p> <p>INTERVIEWS:</p> <p>Agency Head</p> <p>Investigator</p> <p>Staff Interviews</p> <p>Director WVFRIS Center</p> <p>Director of Nursing, Ruby Memorial Hospital</p> <p>West Virginia State Police Captain</p> <p>115.21 West Virginia developed a protocol (SARTS) based on the national protocol. Policy #430.00 outlines procedural steps for access to forensic medical exams and access to victim advocates. The Facility does not perform Forensic examinations. An inmate would be taken to Ruby Memorial Hospital where a SAFE/SANE trained nurse would conduct the forensic exam. Ruby Memorial trained SAFE/SANE nurses are on staff Monday - Friday from 7am - 11:30pm. They would be on call after that time and have a one- hour response time. The WVFRIS provide emotional support and victim advocacy services. The facility investigators are trained in preserving physical evidence and staff interviews determined that staff are aware of the protocol to preserve evidence.</p> <p>Based on this information, the auditor has determined that Northern Regional/Ohio</p>

	County is in compliance with the requirements of this standard.
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<b>115.22</b>	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.22</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>INTERVIEWS:</p> <p>Agency PREA Coordinator</p> <p>Facility PREA Compliance Manager</p> <p>Facility Director</p> <p>Facility Investigator</p> <p>115.22 The Agency policy requires all staff to report any allegations that they are made aware of to their immediate supervisor. All allegations are referred for investigation to the facility investigator. Allegations that involve staff or staff on a work site are referred to West Virginia State Police. According to the PAQ, Northern Regional/Ohio County had 28 allegations during the audit period. One allegation was referred for Criminal Investigation. Administrative investigations were completed for all the other allegations. Staff interviewed were aware of the policy guidelines and staff duty to report. The auditor spoke with a Captain of the West Virginia State Police department and he confirmed that they cooperate with the facility on any investigation.</p> <p>Based on this information, the auditor has determined that Northern Regional/Ohio County meet the requirements of this standard.</p>

<b>115.31</b>	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.31</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>Academy Training Lesson Plan</p> <p>IN-Service Training Lesson Plan</p> <p>Sign In Sheets for Training</p> <p>INTERVIEWS:</p> <p>Agency PREA Coordinator</p> <p>Facility PREA Compliance Manager</p> <p>Staff Interviews</p> <p>115.31 WVDCR Policy require all staff to receive PREA training at the Academy before assuming duty as a new hire. Annual In-Service training include PREA training. The training includes all the elements of this standard.</p> <p>The auditor reviewed the power-point training curriculum and the staff sign-in sheets to indicate they received the training. Staff interviews also indicated that they received the training at the Academy and during Yearly In-Service. The auditor interviewed 2 random staff who had been at the facility less than 6 months. They indicated that the Academy Training indicated that search preference for Transgender would be based on the gender of the facility. They indicated that there are no cross gender searches conducted. If a female inmate required a search and a female was not available, they would use a wand on the female. In Service training is conducted online and monitored by the human resource staff. All staff interviewed with more than a year of service indicated that they had taken their online In Service training</p>

	<p>within the past 12 months.</p> <p>The auditor interviewed 13 random staff, 13 specialized staff and 2 volunteer and 2 contract staff who indicated that they received the PREA training. All staff acknowledged their duty to report and were aware of first responder duties.</p> <p>Based on this information, the auditor has determined that Northern Regional/Ohio County meet the requirement of this standard.</p>
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<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.32</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>OPC PREA Manual – Volunteer Training</p> <p>Volunteer Application</p> <p>PREA Volunteer Agreement</p> <p>Training Sign-In Sheets for Medical Contractors</p> <p>INTERVIEWS:</p> <p>Agency PREA Coordinator</p> <p>Medical Contract Interview</p> <p>Volunteer Interview</p>

	<p>115.32 WVDCR policy require that all volunteers and contractors who have contact with inmates receive PREA training. The training incorporates all the requirements of this standard.</p> <p>Interview with the medical contractor revealed that she receives the PREA annual training from the contractor, Wexford. She was knowledgeable of her duty to report, limits to confidentiality, evidence protocol, and on-going medical needs. Interview with the Food Service Manager (Aramark) revealed he had received PREA training and was aware of his duty to report. Interview with two religious volunteers revealed that they were aware of the duty to report, and protocol to protect the alleged victim and physical evidence. They indicated that they completed annual training.</p> <p>Based on this information, the auditor has determined that Northern Regional/Ohio County is in compliance with this standard.</p>
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<b>115.33</b>	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>115.33</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>Northern Regional/Ohio County Living Guide (Handbook)</p> <p>PREA Brochure (English/Spanish)</p> <p>PREA on Inmate Tablets</p> <p>Homeland Language Service</p> <p>PREA Posters</p> <p>Orientation Sign-In Sheets</p> <p>INTERVIEWS:</p>

	<p>Intake Staff</p> <p>Random Inmate Interviews</p> <p>Facility PREA Compliance Manager</p> <p>115.33 WVDCR policy requires that inmates receive orientation on facility rules and regulations as well as PREA. During intake, the inmates are given a written copy of PREA brochure and inmates rights and responsibilities are reviewed. During the on-site tour, the auditor noted the PREA information throughout the facility. Inmate interviews revealed that inmates were aware of what PREA is and their right to be protected from abuse and harassment. They were aware of multiple ways to make a report of an allegation and felt comfortable with talking to staff if needed. The auditor had an inmate open his tablet to show the PREA information on the tablet. The auditor left a test email message on the website email address. The auditor interviewed 23 random inmates and 16 targeted inmates. The auditor observed an intake of a newly admitted inmate and reviewed the documents in the intake package which included PREA.</p> <p>The auditor reviewed 25 samples of inmate orientation sign-in sheets for each mission of the facility (Prison, Jail, Ohio County) to indicate that PREA was discussed during intake.</p> <p>Based on this information, the auditor has determined that Northern Regional/Ohio County is in compliance with this standard.</p>
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<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.34</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p>

	<p>Certificate of Completion for Investigator Training</p> <p>Investigator Training Curriculum</p> <p>INTERVIEWS:</p> <p>Staff Investigator</p> <p>115.34 WVDCR Policy #430.00 requires agency investigators to complete training regarding the investigation of sexual abuse in a confinement setting. The auditor interviewed the facility investigator assigned to Northern Correction Center. She completed the NIC online course for Investigators and a course on Miranda/Garrity and Interview of Sexual Victims provided by Criminal Investigation Division (CID).</p> <p>The facility investigator demonstrated understanding of requirements of this standard and were able to communicate steps in the investigative process, and collection of physical evidence. The auditor reviewed 4 investigation files and found the reports to be thorough noting how finding was determined and included notice to the inmate.</p> <p>Based on the information provided, the auditor has determined that Northern Regional/Ohio County is in compliance with this standard.</p>
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<b>115.35 Specialized training: Medical and mental health care</b>	
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.35</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>Certificate of Training for Medical Staff</p>



	<p>In-Service Training Lesson Plan</p> <p>INTERVIEWS:</p> <p>Contract Nurse</p> <p>Health Service Administrator</p> <p>Contract Mental Health</p> <p>115.35 WVDCR Policy #430.00 requires that all medical and mental health staff receive yearly training on PREA to include a duty to report, confidentiality limits, and on-going care. The auditor interviewed the nurse contractor for Wexford and she was very knowledgeable about how to treat and care for a victim of sexual abuse. She indicated that she receives annual training through Wexford. The auditor interviewed the Health Service Administrator. He ensures that staff receive their annual in-service training for PREA. The auditor interviewed a contract staff for mental health (PSIMED) and she indicated that she received the NCIC training and training with PSIMED. All mental health and medical staff have received the required specialized training on how to detect and assess signs of sexual abuse and sexual harassment, how to preserve physical evidence of sexual abuse, how to respond effectively and professionally to victims of sexual abuse and sexual harassment, and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment, victim identification, interviewing, reporting and clinical interventions. The auditor reviewed the lesson plan for the training and 12 training certificates acknowledging receipt that they received and understood the training as it relates to the PREA.</p> <p>Based on the information provided, the auditor has determined that Northern Regional/Ohio County is in compliance with this standard.</p>
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<b>115.41</b>	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	115.41

DOCUMENTS:

WVDCR Policy #401.13 Special Attention & Special Needs Alerts

WVDCR Policy #430.00 Prison Rape Elimination Compliance

Sample Screening Forms

INTERVIEWS:

Intake Staff

Case Managers (30 Day Assessment)

Case Managers (72 Hour Assessment)

Inmate Interviews

Facility Compliance Manager

Agency PREA Coordinator

15.41 (a-h) Facility policy and procedures governing this standard indicate that all inmates are to be assessed during the intake screening process for their risk of being sexually abused by other inmates or being sexually abusive toward other inmates and rescreened again within 30 days of arrival. Policy additionally govern that all inmates that transfer from other facilities will be screened again. The Intake Staff give the inmates a brief overview of PREA and the inmate signs acknowledgement of the training. The Booking/Intake staff in the Jail administer the objective Screening instrument when the inmate comes into booking. The first part of the screening is to determine risk of vulnerability or victim and then the second part of the instrument is to determine the risk of being a predator or sexual assaultive offender. In interview with the Intake Officer and observation of the process, it is determined that the inmate can be adequately screened in a private setting to make this determination during this process. It is conducted in the body scanning room, separate from the holding area and may not be overheard by other inmates. Inmates interviewed recall being asked the PREA screening questions at the time of the 72-hour assessment. A Counselor will administer the screening form for the Prison side. The inmates are placed in an orientation unit (C2) for 72 hours and the screening takes place in the counselor office. The medical staff also ask the screening questions for risk during the

	<p>medical assessment and they make referrals to mental health for those who disclose prior abuse or victimization if the inmate requests it or is in agreement to see someone. The system will trigger a housing alert for inmates who score as either victim or abuser. The case managers conduct the 30-day reassessment screenings for all inmates usually within 20 - 30 days. Inmates interviewed recalled being seen by the case manager after arrival and being asked about their perception of their safety and how are they adjusting. The PREA Coordinator indicated that if the inmate did reveal information different from the initial assessment, the case manager can add the information and a new score can be generated. The PREA Coordinator indicated that her office monitors housing alerts in the inmate system OIS to ensure that inmates with PREA Alerts are not housed with any predatory inmates.</p> <p>The auditor reviewed 24 screenings from the Prison, 24 from Jail and 24 from Ohio County for both 72 hour and 30 day reassessment and found that they had been completed timely.</p> <p>Based on this information, the auditor determines that Northern Regional/Ohio County meet the requirement of this standard.</p>
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<b>115.42</b>	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>115.42</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>WVDCR Policy #411.00 Gender Dysphoria</p> <p>Sample Screening Assessments</p>

INTERVIEWS:

Facility PREA Compliance Manager

Case Manager

Agency PREA Coordinator

Target Inmates

115.42 (a-g) WVDCR policy and procedures state that risk screening information is used to determine housing, bed, work, education, and program assignments, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. Determinations for these assignments are made on a case-by-case basis. The auditor interviewed 1 Bi-Sexual; 3 Gay; 2 Transgender inmates at Northern Regional/Ohio County.

According to policy and staff interviews placement and programming assignments for transgender or intersex inmate would be reassessed at least once every six months. Policy states that a transgender or intersex inmate's own view with respect to his own safety should be given serious consideration when making these assignments. Transgender and intersex inmates would be given the opportunity to shower, dress and use the toilet facilities separately from other inmates. Targeted inmate interviews confirmed that inmates may shower separately if they desire. Staff interviews confirmed that a cell in medical has been identified for an inmate to shower separately from other inmates if desired.

During the on-site tour, the auditor observed that the housing unit showers had a half door and full shower curtains and inmates may shower and not be viewed by staff or other inmates. One unit needed to have shower curtains installed and they were ordered.

The auditor reviewed 48 sample files for application of the risk screening and interviewed (2) staff that conduct risk screenings. It was determined that the risk screening is conducted timely and it is an electronic file so a housing alert would highlight if the inmate scored as a victim or abuser.

Based on this information, the auditor determines that Northern Regional/Ohio County is in compliance with this standard.

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115.43	Protective Custody
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.43</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>WVDCR Policy #326.03 Special Management Status</p> <p>INTERVIEWS:</p> <p>Facility Compliance Manager</p> <p>Segregation Lt.</p> <p>Facility Director</p> <p>115.43 WVDCR Policy #326.03 defines and designate administrative detention status and its authorized uses. Inmates held in this status would receive a status review every 30 days. Inmates in this status would receive regular programming on a limited basis. According to the PAQ, Northern Regional/Ohio County did not have any inmates in protective custody as a result of making an allegation of sexual abuse.</p> <p>The auditor interviewed the Segregation Lt. and he confirmed that there were no inmates in protective custody or a special management status due to making an allegation of sexual abuse. The auditor reviewed the segregation roster and also confirmed this status.</p> <p>Based on this information, the auditor determines that Northern Regional/Ohio County are in compliance with this standard.</p>

<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.51</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>PREA Brochure English/Spanish</p> <p>INTERVIEWS:</p> <p>Facility PREA Compliance Manager</p> <p>Agency PREA Coordinator</p> <p>Random Staff Interviews</p> <p>Random Inmate Interviews</p> <p>Interview with Mailroom Officer</p> <p>115.51 (a)(b)(c)(d) WVDCR policy states that they will provide multiple ways for an inmate to report a PREA allegation. PREA Hotline number is a recorded line. If a message is recorded, it is immediately transferred to the PCM, PREA Coordinator, and Facility Investigator as a text message. This is also true if the inmate makes a report using the PREA function on the tablet. A number is also provided on the agency website for the public and on the PREA signage around the facility. The facility/agency does not have a 3rd Party reporting site. All methods are referred to the Office of the Agency PREA Coordinator. It would not be an immediate response. Interview with the mailroom staff indicated that any mail addressed to staff or PCM concerning a PREA issue is forwarded to the PCM. In interviews with random inmates, it was determined that they are aware of the multiple ways in which they could make a report. The majority of the inmates interviewed stated that they would just tell a staff member, but were aware they could use the grievance or 3rd party to make a report. The auditor asked each of the random inmates during interviews and none had made a report. The auditor interviewed one inmate who had made a report of Sexual Harassment by a staff member using the PREA Hotline. It was investigated and was</p>

unfounded. A review of supportive documentation and staff/inmate interviews indicated that there are multiple ways (verbally, in writing, anonymously, privately, and from a third party) for inmates to report sexual abuse/sexual harassment. The facility has procedures in place for staff to document all allegations. The auditor found that PREA signage throughout the facility was sufficient to inform inmates, staff or the public to explain reporting methods. The auditors found during the on-site visit that posters and signage was not prominently displayed which would draw attention to the posters and suggested that a separate bulletin board or area be designated for PREA. The PREA Hotline number was not placed directly on the inmate phones, but it is on the inmate tablets and they must acknowledge the PREA information before use of the tablet. They may hit #01 and call the PREA Hotline directly from the tablet. The auditor tested the public website number for PREA and found it confusing. The instructions said to ask for the PREA Coordinator but left out the step of pressing #0 first to connect to the operator and PREA was not listed during the prompts when you call the number.

Based on this information, it is determined that Northern Regional/Ohio County is in compliance with this standard.

115.52	Exhaustion of administrative remedies
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>115.52</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>INTERVIEWS:</p> <p>Facility PREA Compliance Manager</p> <p>Random Inmate Interviews</p>

115.52 (a-f) WVDCR policy address the mandates of this standard. All allegations of sexual abuse/sexual harassment, when received by staff, will immediately be referred for investigation. Inmates are not required to use an informal grievance process and procedures also allow an inmate to submit a grievance alleging sexual abuse/sexual harassment without submitting it to the staff member who is the subject of the complaint. Additionally, policy also prohibits the investigation of the allegation by either staff alleged to be involved in the incident or any staff who may be under their supervision.

Policy states that there is no time frame for filing a grievance relating to sexual abuse/sexual harassment. Policy also addresses the filing of emergency administrative remedy requests. If an inmate file an emergency grievance with the institution and believes he is under a substantial risk of imminent sexual abuse he will receive an expedited response. The PAQ indicated that no emergency grievances were received in the past 12 months. There were no PREA allegations filed using the grievance process. There is no prohibition that limits third parties, including fellow inmates, staff members, family members, attorneys, and outside victim advocates in assisting inmates in filing requests for grievances relating to allegations of sexual abuse or filing such requests on behalf of inmates. There were no grievances alleging sexual abuse that involved an extension due to the final decision not being reached within 90 days. Additionally, there were no grievances alleging sexual abuse filed by inmates in which the inmate declined third-party assistance. Inmates are held accountable for manipulative behavior and false reporting.

The auditor observed the grievance boxes during the on-site tour. Inmates interviewed were aware of the grievance process as an avenue to file a PREA report. Based on this information, the auditor has determined that Northern Regional/Ohio County is in compliance with this standard.

<b>115.53</b>	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	115.53



DOCUMENTS:

WVDCR Policy #430.00 Prison Rape Elimination Compliance

MOU with WVFRIS

PREA Brochure

INTERVIEWS:

Agency PREA Coordinator

Inmate Interviews

Medical Staff Interview

Interview with WVFRIS Victim Advocate

Northern Regional/Ohio County and the Agency has a MOU with the West Virginia Foundation for Rape Information Service to provide emotional support at the hospital and to act as a victim advocate. The auditor interviewed the Administrative Manager of the Sexual Assault Center of West Virginia and she confirmed that Northern Regional/Ohio County was in her jurisdiction and her center would provide any resources needed to assist the inmates.

Inmate interviews revealed that they would feel confident utilizing these services and felt that their conversations would remain private. Inmates acknowledged that the information is available and accessible if they needed it.

Based on this information, the auditor has determined that Northern Regional/Ohio County is in compliance with this standard.

<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard

	<p><b>Auditor Discussion</b></p> <p>115.54</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>PREA Website</p> <p>PREA Brochures</p> <p>INTERVIEWS:</p> <p>Agency PREA Coordinator</p> <p>Staff Interviews</p> <p>Inmate Interviews</p> <p>115.54 (a) WVDCR Policy, and the PREA Posters outline the ways in which an inmate, staff, or the public can make a report of a sexual abuse or sexual harassment allegation. The Inmate Living Guide Handbook and WVDCR website meet the requirements of this standard.</p> <p>The random inmates interviewed indicated they were aware of third-party reporting. The random staff interviewed indicated that they were aware that an inmate could make a third party report. The PREA posters listed the ways in which a report could be made. According to the PAQ and review of investigative files, there were no allegations received via 3rd party reporting.</p> <p>Based on this information, it is determined that Northern Regional/Ohio County meet the requirements of this standard.</p>
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<b>115.61</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard

**Auditor Discussion**

115.61

DOCUMENTS:

WVDCR Policy #430.00, Prison Rape Elimination Compliance

INTERVIEWS:

Random Staff

Contract Medical/Mental Health Staff

Volunteer

Facility PREA Compliance Manager

115.61 (a) (b) (c) (d) (e) WVDCR policy outline the duties of security and non-security first responders and meet the mandates of this standard. Staff, contractors, and volunteers must report and respond to allegations of sexually abusive behavior, regardless of the source of the report.

Interviews with Random staff members indicated they were aware of their duty to immediately report all allegations of sexual abuse, sexual harassment, and retaliation relevant to the PREA standards. The reporting is made to the immediate supervisor or any security staff in the area if the person receiving the report is non-security. They were aware that all reports are to be documented in writing before the end of their shift. Interviews with volunteer and contract staff also revealed that volunteers and contractors receive training on their duty to report. The facility does not house vulnerable inmates under the age of 18.

Medical and Mental Health staff interviews confirmed that unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners shall be required to report sexual abuse pursuant to paragraph (a) of this section and to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services.

Based on a review of established policy and interviews with staff it is determined that Northern Regional/Ohio County is in compliance of this standard.

**115.62 Agency protection duties**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

115.62

DOCUMENTS:

WVDCR Policy #430.00, Prison Rape Elimination Compliance

INTERVIEWS:

Facility Director

Facility PREA Compliance Manager

Higher Level Staff

Random Staff

115.62 (a) WVDCR Policy PREA Rape Elimination Compliance outlines the duties of security and non-security first responders. The policy state upon security staff learning of an allegation that an inmate was sexually abused, or is in imminent risk of abuse staff shall take steps to ensure preservation of the area in which the alleged abused occurred including requesting that the alleged victim and abuser not take any action that may destroy physical evidence including changing clothes, bathing, brushing teeth, urinating, defecating, drinking, or eating., etc. If the first staff responder is not a security staff, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff. There were no non-security staff that served as a first responder. According to the PAQ, there were 28 allegations reported during last 12 months. According to the PAQ, 13 staff were required to act as a first responder. In an

	<p>interview with the Facility PCM and Facility Investigator, they stated that staff are trained to follow the PREA Checklist even if the report is not made within a timeframe in which physical evidence can be collected. The Facility Investigator stated that there was 1 allegation referred for criminal prosecution. All staff interviewed were aware of first responder duties. The PAQ indicated that there were no reports of an inmate being at imminent risk of sexual assault.</p> <p>Based on a review of the policy and through interviews with staff and inmates, it is determined that the facility is in compliance with this standard.</p>
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<b>115.63 Reporting to other confinement facilities</b>	
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>115.63</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>INTERVIEWS:</p> <p>Facility Director</p> <p>Facility PREA Compliance Manager</p> <p>Facility Investigator</p> <p>115.63 (a) (b) (c) (d) WVDCR Policy #430.00 Prison Rape Elimination Compliance meets the requirements of this standard. Policy requires that any inmate allegation of sexual abuse that occurred while confined at another facility be reported to the head of the facility where the alleged abuse occurred within 72 hours of receipt of the allegation. Procedures are in place that require the Facility Director to immediately notify the Director of the other confinement facility, in writing, of the nature of the sexual abuse allegation. The notification is to occur as soon as possible, but always</p>

	<p>within 72 hours of receiving the allegation. Policy also requires that an investigation be initiated. According to the PAQ, in the past 12 months, there were no allegations made by an inmate that they were sexually harassed or sexually abused at another facility. The PAQ also indicated that Northern Regional/Ohio County had not been informed that an inmate alleged abuse while confined at their facility from another facility.</p> <p>Based on a review of agency policy, interviews with Facility Director, PREA Compliance Manager, PREA Coordinator and investigative staff it is determined that Northern Regional/Ohio County is in compliance with this standard.</p>
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<b>115.64</b>	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.64</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>INTERVIEWS:</p> <p>Random Staff</p> <p>Medical/Mental Health Staff</p> <p>Volunteer</p> <p>115.64 (a) (b) Agency policies and procedures state that upon staff learning of an allegation that an inmate was sexually abused, staff shall take steps to ensure preservation of the area in which the alleged abused occurred including requesting that the alleged victim and abuser not take any action that may destroy physical evidence including changing clothes, bathing, brushing teeth, urinating, defecating,</p>

drinking, or eating., etc. If the first staff responder is not a security staff, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff.

Interviews with random staff indicated that they were aware of first responder duties. According to the PAQ, there were 13 allegations of sexual abuse and staff separated the victim and abuser. There were 4 instances in which staff collected physical evidence. The auditor interviewed the facility investigator who stated that although staff followed the coordinated response protocol and collected physical evidence, it was not used in the case. She stated that staff follow the first responder protocol in all allegations regardless if it is abuse or harassment. The facility has developed policies that outline the responsibilities of security and non-security staff first responder responsibilities. First responder duties are also included during the annual cycle training.

Based on interviews and review of policy it is determined that Northern Regional/Ohio County is in compliance with this standard.

<b>115.65 Coordinated response</b>	
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	115.65
	DOCUMENTS:
	WVDCR Policy #430.00 Prison Rape Elimination Compliance
	MOU WVFRIS
	PREA Checklist
	INTERVIEWS:

Facility Director

Facility PREA Compliance Manager

Random Staff

Medical Staff

Facility Investigator

115.65 (a) WVDCR Policy #430.00 address the mandates of this standard. Staff are required to take actions to secure the inmate and protect the crime scene if staff become aware in time to collect physical evidence. After learning of an allegation that an inmate was sexually abused, the first staff member responding to the report shall notify the supervisor, separate the alleged victim and assailant, preserve and protect the crime scene, if applicable, until the appropriate steps can be taken to collect any evidence, monitor the alleged victim and assailant to ensure physical evidence is not destroyed, including washing, brushing teeth, changing clothes, urinating, defecating, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence. The responding supervisor will ensure that the alleged victim and known abuser are taken to medical and mental health services for examination and evaluation.

Northern Regional/Ohio County has a PREA Response Checklist that provides detailed guidance to employees regarding the expected coordinated actions to take place in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership. According to the PAQ, staff responded to 4 alleged incidents in which they were in time to separate the victim and alleged abuser and collect physical evidence. In interview with the facility investigator, she stated that staff usually follow all the steps even in sexual harassment cases as well as sexual abuse cases and regardless of the amount time passed since the incident and the time they become aware.

Interviews with random staff and medical and mental health staff revealed that staff were aware of the process and procedures for a first responder. The auditor did not interview anyone identified as a first responder, but in higher-level staff interviews the shift commanders were aware of the first responder protocols and stated they would instruct staff on how to proceed.

Based on the results of staff interviews it is determined that Northern Regional/Ohio County meet the mandates of this standard in that staff are aware of the coordinated response.



<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.66</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>Memo from Agency PREA Coordinator re: No Union</p> <p>INTERVIEWS:</p> <p>Agency Head</p> <p>Agency PREA Coordinator</p> <p>115.66 Based on the auditor review of the agency website and interviews with the Agency Head, it is determined that Northern Regional/Ohio County does not operate under a collective bargaining agreement. There is no evidence that the agency's ability to remove an alleged staff abuser from contact with inmates pending outcome of an investigation is prohibited.</p> <p>It is determined that the agency is in full compliance with this standard.</p>

<b>115.67</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	115.67

DOCUMENTS:

WVDCR Policy #430.00 Prison Rape Elimination Compliance

OPC PREA Manual

Example of Retaliation Monitoring Form

INTERVIEWS:

Facility PREA Compliance Manager

Facility Superintendent

Inmate who Reported Abuse

115.67 (a - f) WVDCR has a policy and procedure that govern the mandates of this standard. The policy prohibits any type of retaliation against any staff or inmate who reports sexual abuse or sexual harassment or cooperates in related investigations. The monitoring of any type of retaliation is conducted for at least 90 days or longer if warranted. Policy outlines the protection measures available and requires the prompt re-mediation of any type of retaliation. The facility has designated the PREA Compliance Manager as the Retaliation Monitor.

The PAQ indicated that there was one allegation of sexual abuse during the monitoring period which required continued monitoring. There was one inmate present during the on-site visit that had reported abuse and was monitored for 90 days on retaliation monitoring. The PCM stated in interview that she begins to monitor at the time of the allegation and continues for the 90- day monitoring period or until allegation is determined to be unfounded. The monitoring time may be extended if needed. The facility has established an Incident Review Team. The auditor reviewed the meeting minutes from the Review team and found that they discussed all areas required by the standard and made a recommendation to the Superintendent which was approved. The auditor suggested that the team meet at a minimum quarterly if there are no cases and do a walk-around of the facility for PREA related issues.

Based on the interview conducted with PCM it is determined that Northern Regional/

	Ohio County is in compliance with this standard.
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<b>115.68 Post-allegation protective custody</b>	
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 510 544 544"><b>Auditor Discussion</b></p> <p data-bbox="256 584 360 618">115.68</p> <p data-bbox="256 730 453 763">DOCUMENTS:</p> <p data-bbox="256 875 1106 909">WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p data-bbox="256 1021 443 1055">INTERVIEWS:</p> <p data-bbox="256 1167 469 1200">Segregation Lt</p> <p data-bbox="256 1234 515 1267">Higher Level Staff</p> <p data-bbox="256 1379 1474 1872">115.68 (a) (b) WVDCR policy and procedures meet the mandates of this standard and states that inmates who allege to have suffered sexual abuse may not be placed in involuntary segregated housing, unless an assessment of all available alternatives has been made and there is a determination that there is no available alternative means of separation from likely abusers. Additionally, to the extent possible, access to programs, privileges, education, and work opportunities are not limited to inmates placed in the protective custody. The facility would document the reasons for restricting access to programs and the length of time the restriction would last. The PAQ indicated that there were no inmates held in involuntary segregated housing for one to 24 hours awaiting completion of assessment and none held in involuntary segregated housing for longer than 30 days while awaiting alternative placement in the past 12 months.</p> <p data-bbox="256 1906 1358 1984">Based on interviews with staff and review of policy and procedures confirmed compliance with this standard.</p>

<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.71</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00, Prison Rape Elimination Compliance</p> <p>DMAPS Operations – Corrections Operation 3</p> <p>Training Certificate of Investigator</p> <p>INTERVIEWS:</p> <p>Facility Investigator</p> <p>Facility PCM</p> <p>Facility Director</p> <p>115.71 (a – i) WVDCR policy and DMAP procedures address the mandates of this standard. The policy and procedures require a prompt, thorough, and objective investigation of all allegations, including from third parties, of sexual abuse or sexual harassment from an inmate or staff member or third party. Policy requires that the investigator collect and use any available physical and DNA evidence, video data, and interview any alleged victim, alleged abuser, or witness and assess their credibility.</p> <p>WVDCR policy also require that investigations are performed by persons who have received specialized training to conduct such investigations. Written reports are required that contain a description of the physical evidence, testimonial evidence, investigative facts and finding and the reasoning that determines credibility.</p> <p>In accordance with PREA standards, during the course of such investigations, the Agency shall impose no standard higher than a preponderance of the evidence when determining whether allegations of sexual abuse or harassment are substantiated.</p>

	<p>The facility investigators conduct administrative investigations at Northern Regional/ Ohio County. If the allegation involves a staff member, The West Virginia State Police will conduct the investigation. If the inmate investigation becomes a criminal investigation, it will be turned over to the State Police to conduct the criminal investigation. The credibility of an alleged victim, suspect or witness is assessed on an individual basis and is not determined by the person’s status as inmate or staff. The Facility does not require an inmate who alleges sexual abuse to submit to a polygraph examination or other truth assessment device as a condition for proceeding with the investigation of such an allegation. There has been one criminal investigation for Northern Regional/Ohio County during the review period. The auditor reviewed the investigative case files and determined that the interviews and information collected were sufficient to make the determination that the allegation was unfounded. The auditor interviewed the facility investigator and she verified that the facility conducts an administrative investigation of all allegations and if it becomes criminal it will be referred to the West Virginia State Police. She indicated that they have a good relationship and they share their findings and respect their investigative work.</p> <p>Based on the review of agency policies and procedures, and interviews with facility investigator, it is determined that Northern Regional/Ohio County is in compliance with this standard.</p>
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<b>115.72</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>115.72</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>INTERVIEWS:</p> <p>Facility Investigator</p>

	<p>115.72 (a) WVDCR policies and procedures meet the mandate of this standard. The evidence standard is a preponderance of the evidence in determining whether administrative allegations of sexual abuse or sexual harassment are substantiated.</p> <p>The PREA Investigator training provide in-depth clarification of this standard and the investigator assigned to Northern Regional/Ohio County have completed the training.</p> <p>Based on the review of agency policy and procedures, interview with the facility investigator, and a review of a sample investigation case file it is determined that Northern Regional/Ohio County is in compliance with this standard.</p>
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115.73 Reporting to inmates	
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>115.73</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00, Prison Rape Elimination Compliance  Corrections Operations 3 - DMAPS Investigative Unit</p> <p>INTERVIEWS:</p> <p>Facility Investigator</p> <p>115.73 (a - f) WVDCR policies and procedures address the mandates of this standard. The facility has a policy requiring any inmate who makes an allegation that he suffered sexual abuse or sexual harassment at Northern Regional/Ohio County facility be informed, in writing, whether the allegation has been determined to be unsubstantiated, substantiated or unfounded, at the conclusion of the investigation. When an allegation involves staff, the inmate would be informed if the staff member is no longer posted within their housing unit, is no longer employed at the facility, if</p>

the staff member was indicted on a charge related to sexual abuse within the facility or the Facility learned that the staff member was convicted on a charge related to sexual abuse. These findings would also be communicated to the inmate if the investigation was completed by an outside agency.

When an inmate's allegation that he has been sexually abused by another inmate, the agency subsequently informs the alleged victim whenever the agency learns that the alleged abuser has been indicted or convicted on a charge related to sexual abuse within the facility. The PAQ indicated that there were 13 administrative/ criminal investigations completed during the past 12 months. There was 1 allegation of sexual abuse. A review of the investigation file revealed that there was documentation that the inmate had been notified in writing as to the outcome of the investigation. The auditor interviewed an inmate who reported sexual abuse and he indicated that he was informed of the outcome of the investigation. The auditor interviewed an inmate who reported sexual harassment against a staff member and he indicated that he was informed of the outcome and also informed that the staff member was no longer employed at Northern Regional/Ohio County.

Based on a review of the information provided, it is determined that Northern Regional/Ohio County is in Compliance with this standard.

115.76	Disciplinary sanctions for staff
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.76</p> <p>Documents:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>WVDCR Policy #129.00 Ethics/Standards of Conduct</p> <p>INTERVIEWS:</p>

	<p>Facility Director</p> <p>Agency PREA Coordinator</p> <p>Facility PREA Compliance Manager</p> <p>Facility Human Resource Director</p> <p>Facility Investigator</p> <p>115.76 (a) (b) (c) (d) Facility policies and procedures address the mandates of this standard. Staff members are subject to disciplinary sanctions for violating Facility sexual abuse or sexual harassment policies. Discipline would be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history and the sanctions imposed for comparable offenses by other staff with similar histories. According to the PAQ, there have been 2 staff disciplined for allegations of sexual abuse or sexual harassment and memos were posted from the Superintendent that these staff were no longer allowed into the facility. The staff were allowed to resign in lieu of prosecution.</p> <p>Based on the review of policies and procedures and interviews with the investigative staff and Human Resource Manager it is determined that Northern Regional/Ohio County is in compliance with this standard.</p>
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<b>115.77</b>	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.77</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>INTERVIEWS:</p>



	<p>PREA Compliance manager</p> <p>Volunteer</p> <p>Contract Medical</p> <p>115.77 (a) (b) WVDCR policies and procedures address the mandates of this standard. Any contractor or volunteer who engages in sexual abuse/sexual harassment would be prohibited from contact with inmates and would be reported to the appropriate investigator and law enforcement or relevant professional licensing/certifying bodies unless the activity was clearly not criminal in nature. In cases that were not criminal in nature, the facility would take appropriate remedial measures and consider whether to prohibit further contact with inmates. According to the PAQ, there were 3 incidents where a contractor or volunteer was accused of, suspected, or found guilty of sexual abuse or sexual harassment at Northern Regional/Ohio County during the past 12 months. A memo from the Superintendent and a memo from the Agency Commissioner was issued stating that these individuals were no longer allowed into any State of West Virginia facility.</p> <p>Based on the review of policy and interviews it is determined that Northern Regional/Ohio County is in compliance with this standard.</p>
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<b>115.78</b>	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.78</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>Inmate Handbook</p> <p>INTERVIEWS:</p>

	<p>Facility Director</p> <p>Inmate Who Reported Abuse</p> <p>115.78 (a - g) WVDCR Policies and Procedures address the mandates of this standard. Policy defines sexual assault of any person, involving non-consensual touching by force or threat of force, as the greatest severity level prohibited act. The policy identifies inmates engaging in sexual acts and making sexual proposals or threats to another as a high severity level prohibited act. Consensual sex or sexual harassment of any nature is prohibited and will result in discipline. Consensual sex between inmates does not constitute sexual abuse. Sanctions are commensurate with the nature and circumstances of the abuse committed, along with the inmate's disciplinary history and the sanctions imposed for comparable offenses by other inmates with similar histories. Inmates are subject to disciplinary sanctions pursuant to the formal disciplinary process defined in the Inmate Discipline Policy. According to the PAQ, there was one case in which there was a substantiated allegation of inmate on inmate sexual abuse. There were 4 cases that were unsubstantiated. The auditor interviewed an inmate who made an allegation of sexual abuse against another inmate which was unsubstantiated. The inmate was not happy with the outcome of the investigation. The auditor reviewed the investigative file and heard the inmate's recount of the incident. Although, the allegation could not be substantiated, the facility changed the other inmate's job and housing unit to err on the side of caution. The alleged victim did state that nothing happened, but he felt like it could have if another inmate had not entered the restroom. The disciplinary process considers whether an inmate's mental disabilities or mental illness contributed to the inmate's behavior when determining what type of sanction, if any, should be imposed. The facility offers the alleged abuser therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse. The institution does not discipline inmates who make an allegation in good faith, even if an investigation does not establish evidence sufficient to substantiate the allegation.</p> <p>Based on the policies and procedures and interview with the Facility Director it is determined that Northern Regional/Ohio County meets the mandate of this standard.</p>
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<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	115.81

DOCUMENTS:

WVDCR Policy #430.00 Prison Rape Elimination

INTERVIEWS:

Medical/Mental Health

115.81 (a) (b) (c) (d) (e) Agency policies and procedures address the requirements of this standard. Booking Intake and Counselors (Prison) conduct the initial PREA Screenings for the determination of risk. Medical Staff also conduct the risk screening form to determine if an inmate requires a referral to Mental Health. Interview with the Health Service Administrator verified that medical staff conduct the screenings as part of their intake procedures. He verified that if an inmate discloses either prior victimization or prior abuse history, the medical staff will generate a referral to mental health. Interview with the Correctional Counselor verified that when she conducts the re-assessment she is able to see all prior screenings and if an inmate discloses as prior victim or abuser. She stated that if a referral had not been made and she felt there was a need, she would refer the inmate. The auditor interviewed (1) inmate who disclosed prior victimization during screening. He indicated that he had been seen by mental health, but he did not require on-going sessions.

Verification that the inmate was referred to mental health and seen by mental health staff within 14 days was provided. Treatment services are offered without financial cost to the inmate. This was confirmed by interview with the PREA Compliance Manager. During interviews with Mental Health and Medical Staff they verified that they notify offenders of their duty to report allegation of sexual abuse prior to their initial screening and medical reviews. They indicated that they would receive signed and dated informed consents from inmates. The institution does not house inmates under the age of 18. All screenings are recorded in the Medical and Mental Health inmate records. The information related to sexual abusiveness and/or sexual victimization is limited to health care, mental health practitioners and other staff on a need-to-know basis for security, treatment plans, program assignments, housing, work, and management decisions.

Based on the information provided, it is determined that Northern Regional/ Ohio County is in compliance with this standard.

<b>115.82</b>	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.82</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>INTERVIEWS:</p> <p>Health Service Administrator</p> <p>Contract Medical</p> <p>SAFE/SANE Director</p> <p>115.82 (a) (b) (c) (d) WVDCR policy and procedures address the requirements of this standard. Wexford Health Services provide contract services for medical services at Northern Regional/Ohio County. WVDCR has policies and procedures in place to offer medical and mental health evaluation as appropriate, and treatment to all inmates who have been victimized by sexual abuse. The evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer or release. These services are provided to victims consistent with the community level of care. The facility medical and mental health personnel provide emergency medical services to inmates. Facility policy prohibits inmate co-pays for medical treatment to victims of sexual abuse and all treatment is offered at no financial cost to the inmate. Inmate victims of sexual abuse, while incarcerated, are offered information about and timely access to information on sexually transmitted infection prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. The auditor interviewed the Health Service Administrator and a Nurse on duty. They both confirmed that inmates would be treated and triaged immediately and would be sent to Ruby Memorial Hospital if needed in their professional judgement. The auditor interviewed a SAFE/SANE nurse Ruby Memorial Hospital and she indicated that they do have SAFE/SANE nurses on duty Monday – Friday and a nurse is on call after 11:30 pm and on weekends if a forensic exam is needed. She indicated that when a nurse is not on duty, the on-call nurse will respond within an hour.</p>

	<p>Compliance with this standard was determined by a review of policy/documentation and interviews with medical staff and the SAFE/SANE nurse. The PAQ indicates that there were no inmates who reported sexual abuse that required a forensic exam during the auditing period. It is determined that Northern Regional/Ohio County does meet the mandates of this standard.</p>
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<p><b>115.83</b></p>	<p><b>Ongoing medical and mental health care for sexual abuse victims and abusers</b></p>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>115.83</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>INTERVIEW:</p> <p>Contract Medical/Mental Health</p> <p>Random Inmates</p> <p>115.83 (a - h) WVDCR policy and procedures address the requirements of this standards. The facility will provide sexually abused victims with medical and mental health services consistent with the community level of care. Inmate victims of sexual abuse, while incarcerated, will be offered tests for sexually transmitted infections, as medically appropriate. All treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p>

	<p>The facility will attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners. Health services include medical and mental health aftercare plans to be developed no later than 30 days prior to the anticipated date of release for inmates subjected to sexual abuse. The facility would assist in the arrangement of referrals for continued care following their transfer to or placement in other facilities or after their release from custody, if needed. Victims would also receive timely and comprehensive information about and timely access to all necessary medical services. The PAQ indicated that there were 10 inmates who reported sexual abuse during the auditing period. 2 of the allegations were substantiated. The auditor interviewed 2 inmates who reported abuse but they were at another facility. There were no inmates at Northern Regional/ Ohio County who reported abuse at that facility. The auditor interviewed a medical nurse and mental health staff, they each stated that an inmate would be sent out immediately if needed and they would continue to follow-up with a treatment plan. The auditor interviewed random inmates who reported that felt confident that they would receive on-going care if needed and that any conversations with mental health would remain confidential.</p> <p>Based on interview with medical and mental health staff, it is determined that Northern Regional/Ohio County meet the requirements of this standard.</p>
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<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>115.86</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>Sample Sexual Abuse Incident Review</p> <p>PREA Annual Reports</p> <p>INTERVIEWS:</p>

	<p>Agency Head</p> <p>Agency PREA Coordinator</p> <p>Facility PREA Compliance Manager</p> <p>115.86 (a) (b) (c) (d) (e) WVDCR policies and procedures outline and identify the requirements and procedures for the completion of an incident review at the conclusion of every sexual abuse investigation unless the allegation was determined to be unfounded. The review shall ordinarily occur within 30-days of the conclusion of the investigation. The policy states the team will be comprised of a multi-disciplined team to serve on the review team. The facility PREA Compliance Manager shall document review in the report including recommendations for improvements. The report shall be submitted to the Facility Director who shall ensure implementation of the recommendations or document the reason for not following them. Northern Regional/Ohio County has had two substantiated case in the past 12 months. The Incident Review Team meet with each case and the auditor reviewed the meeting minutes. The meeting minutes included: 1) Whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; 2) Whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility; 3) Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; 4) Assess the adequacy of staffing levels in that area during different shifts; 5) Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff. 6) Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1) - (d)(5), and any recommendations for improvement and submit such report to the facility head and PREA Compliance Manager. The auditor recommended to the Facility Director that they convene the team and have a meeting at least quarterly if they do not have a case to review and do a walk around the facility to assess the facility needs from a PREA perspective.</p> <p>Based on the review of WVDCR policy and information provided, the auditor has determined that Northern Regional/Ohio County is in compliance with this standard.</p>
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<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

	<p>115.87</p> <p>DOCUMENTS:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>INTERVIEW:</p> <p>Agency PREA Coordinator</p> <p>115.87 (a-f) WVDCR policies and procedures require that statistics on sexual incidents be collected in accordance with Bureau of Justice Statistics guidelines. The PREA Coordinator gathers data for the annual report. The most recent agency annual report is for FY2022. The report is available on the agency website.</p> <p>It is determined that the agency is in compliance with this standard.</p>
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<b>115.88</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.88</p> <p>DOCUMENTS:</p> <p>WVDCR Policy#430.00 Prison Rape Elimination Compliance</p> <p>PREA Annual Report</p>



	<p>INTERVIEW:</p> <p>Agency PREA Coordinator</p> <p>WVDCR policy and procedures require that statistics gathered in the annual report be used to evaluate and improve operations to enhance inmate safety. The annual reports are available on the agency website. The data for the 2022 annual report includes an analysis of the data compared to previous years and discuss changes considered to address issues raised by the data.</p> <p>It is determined that the agency is in compliance with this standard.</p>
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<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.89</p> <p>DOCUMENT:</p> <p>WVDCR Policy #430.00 Prison Rape Elimination Compliance</p> <p>INTERVIEW:</p> <p>Agency PREA Coordinator</p> <p>115.89 (a) (b) (c) (d) WVDCR policy #430.00 Prison Rape Elimination Compliance addresses the requirements of this standard. Data is retained in a secure filing system. The annual report will not contain any personal identifiers and policy requires that the statistical data be retained for a period of no less than 10 years, unless</p>

	<p>federal, state, or local law requires otherwise. The Agency will make the information available on the WVDCR website. The report will cover all data required in the elements of this standard.</p> <p>Compliance with this standard was determined by a review of the 2022 annual report, policy/documentation, review of the electronic system for data storage and retrieval and interview with the Agency PREA Coordinator.</p>
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<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.401</p> <p>115.401 (a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) This was a combined audit of the Northern Regional Correction Center that includes a Prison and Jail and houses female inmates in the jail and Ohio County Correctional Center which is a community based program but audited under the Prison/Jail Standards. The PRC authorized this auditor to conduct the audit of both facilities as one and prepare one report. The last audit was conducted by Robert Lanier in July of 2021. A review of the West Virginia Department of Corrections and Rehabilitation website confirmed the posting of the PREA information.</p> <p>The auditor received confirmation of the PREA Audit Notice Posting on May 5, 2024. The notices were posted earlier based on another auditor was going to conduct the audit. This auditor accepted the audit when the previous auditor was unable to continue. The PRC approved the change in auditors and indicated that the audit date did not need to change to accommodate a new notice. The original notice was posted six weeks prior to the first day of the on-site visit on May 14 - 17, 2024. The PREA Audit Notice was identified as posted in the inmate housing unit bulletin boards, and inmate visitation. It was posted in areas that were fully accessible for viewing by staff, visitors and the inmate population. The auditor did not receive any confidential mail from Northern Regional/Ohio County staff and/or the inmate population. The auditor checked with the original auditor who had not received any correspondence. No inmates and/or staff requested to speak with the auditor during the site visit. All inmates selected by the auditor during the site visit cooperated with the interview.</p>

	<p>The auditor was provided full access to all buildings and areas during the tour and throughout the site visit. Areas observed during the site visit included but was not limited to the following: housing units, food service, medical, mental health, administrative offices, inmate program areas, mailroom, visitation area, and recreation.</p> <p>The OAS was used to complete the audit process with a review period of April 1, 2023 – May 31, 2024. The auditor began identifying and requested rosters and documentation via email on May 5, 2024, which was followed by numerous additional requests throughout the pre-audit phase and on-site visit via email, telephone calls and during the site visit. The auditor received all requested copies to include electronically stored relevant documents for review in a determination of compliance for numerous standards.</p> <p>It is determined that Northern Regional/Ohio County is in compliance with this standard.</p>
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<b>115.403</b>	<b>Audit contents and findings</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>115.403</p> <p>DOCUMENT:</p> <p>Agency Website at <a href="https://dcr.wv.gov/resources/Pages/prea.aspx">https://dcr.wv.gov/resources/Pages/prea.aspx</a></p> <p>INTERVIEW:</p> <p>Agency PREA Coordinator</p> <p>Annual reports for FY2022 are posted on the website for review. Final PREA Audit Reports for several WVDCR facilities are posted for review.</p>

	<p>Based on this information, it is determined that the Agency is in compliance with this standard.</p>
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<b>Appendix: Provision Findings</b>		
<b>115.11 (a)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
<b>115.11 (b)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
<b>115.11 (c)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
<b>115.12 (a)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	yes
<b>115.12 (b)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure	yes

	that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	
<b>115.13 (a)</b>	<b>Supervision and monitoring</b>	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into	yes

	consideration: Any applicable State or local laws, regulations, or standards?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
<b>115.13 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
<b>115.13 (d)</b>	<b>Supervision and monitoring</b>	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

<b>115.14 (a)</b>	<b>Youthful inmates</b>	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.14 (b)</b>	<b>Youthful inmates</b>	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.14 (c)</b>	<b>Youthful inmates</b>	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.15 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
<b>115.15 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the	yes



	facility does not have female inmates.)	
<b>115.15 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
<b>115.15 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
<b>115.15 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

<b>115.16 (a)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication	yes

	with inmates with disabilities including inmates who: Have intellectual disabilities?	
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
<b>115.16 (b)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
<b>115.16 (c)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
<b>115.17 (a)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who	yes

	may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
<b>115.17 (b)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
<b>115.17 (c)</b>	<b>Hiring and promotion decisions</b>	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
<b>115.17 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes

<b>115.17 (e)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
<b>115.17 (f)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
<b>115.17 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	

	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
<b>115.21 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
<b>115.21 (b)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
<b>115.21 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	no

	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
<b>115.21 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	na
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
<b>115.21 (e)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
<b>115.21 (f)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
<b>115.21 (h)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	na
<b>115.22 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	

	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
<b>115.22 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
<b>115.22 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
<b>115.31 (a)</b>	<b>Employee training</b>	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes



	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
<b>115.31 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
<b>115.31 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
<b>115.31 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.32 (a)</b>	<b>Volunteer and contractor training</b>	

	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
<b>115.32 (b)</b>	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
<b>115.32 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
<b>115.33 (a)</b>	<b>Inmate education</b>	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
<b>115.33 (b)</b>	<b>Inmate education</b>	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
<b>115.33 (c)</b>	<b>Inmate education</b>	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes

	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes
<b>115.33 (d)</b>	<b>Inmate education</b>	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes
<b>115.33 (e)</b>	<b>Inmate education</b>	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
<b>115.33 (f)</b>	<b>Inmate education</b>	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes
<b>115.34 (a)</b>	<b>Specialized training: Investigations</b>	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.34 (b)</b>	<b>Specialized training: Investigations</b>	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and	yes

	Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.34 (c)</b>	<b>Specialized training: Investigations</b>	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.35 (a)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or	yes

	suspicious of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
<b>115.35 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
<b>115.35 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.35 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
<b>115.41 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
<b>115.41 (b)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
<b>115.41 (c)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all PREA screening assessments conducted using an objective	yes

	screening instrument?	
<b>115.41 (d)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10)	yes

	Whether the inmate is detained solely for civil immigration purposes?	
<b>115.41 (e)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
<b>115.41 (f)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes
<b>115.41 (g)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
<b>115.41 (h)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
<b>115.41 (i)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive	yes

	information is not exploited to the inmate's detriment by staff or other inmates?	
<b>115.42 (a)</b>	<b>Use of screening information</b>	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
<b>115.42 (b)</b>	<b>Use of screening information</b>	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
<b>115.42 (c)</b>	<b>Use of screening information</b>	
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would	yes



	present management or security problems?	
<b>115.42 (d)</b>	<b>Use of screening information</b>	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes
<b>115.42 (e)</b>	<b>Use of screening information</b>	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
<b>115.42 (f)</b>	<b>Use of screening information</b>	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
<b>115.42 (g)</b>	<b>Use of screening information</b>	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing	yes

	solely for the placement of LGBT or I inmates pursuant to a consent degree, legal settlement, or legal judgement.)	
<b>115.43 (a)</b>	<b>Protective Custody</b>	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
<b>115.43 (b)</b>	<b>Protective Custody</b>	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
<b>115.43 (c)</b>	<b>Protective Custody</b>	

	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
<b>115.43 (d) Protective Custody</b>		
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
<b>115.43 (e) Protective Custody</b>		
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
<b>115.51 (a) Inmate reporting</b>		
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
<b>115.51 (b) Inmate reporting</b>		
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain	yes

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes
<b>115.51 (c)</b>	<b>Inmate reporting</b>	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.51 (d)</b>	<b>Inmate reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
<b>115.52 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
<b>115.52 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes

	this standard.)	
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (e)</b>	<b>Exhaustion of administrative remedies</b>	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (f)</b>	<b>Exhaustion of administrative remedies</b>	

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.).	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (g)</b>	<b>Exhaustion of administrative remedies</b>	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
<b>115.53 (a)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	na

	including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
<b>115.53 (b)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
<b>115.53 (c)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
<b>115.54 (a)</b>	<b>Third-party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
<b>115.61 (a)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual	yes

	abuse or sexual harassment or retaliation?	
<b>115.61 (b)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
<b>115.61 (c)</b>	<b>Staff and agency reporting duties</b>	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
<b>115.61 (d)</b>	<b>Staff and agency reporting duties</b>	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
<b>115.62 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
<b>115.63 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes



<b>115.63 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.63 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
<b>115.64 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
<b>115.64 (b)</b>	<b>Staff first responder duties</b>	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
<b>115.65 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in	yes

	response to an incident of sexual abuse?	
<b>115.66 (a)</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
<b>115.67 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
<b>115.67 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
<b>115.67 (c)</b>	<b>Agency protection against retaliation</b>	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of	yes

	sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
<b>115.67 (d)</b>	<b>Agency protection against retaliation</b>	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
<b>115.67 (e)</b>	<b>Agency protection against retaliation</b>	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
<b>115.68 (a)</b>	<b>Post-allegation protective custody</b>	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
<b>115.71 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	When the agency conducts its own investigations into allegations	yes

	of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
<b>115.71 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
<b>115.71 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
<b>115.71 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
<b>115.71 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
<b>115.71 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes

	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
<b>115.71 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
<b>115.71 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
<b>115.71 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
<b>115.71 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
<b>115.71 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes

<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
<b>115.73 (c)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (d)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	yes

	abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	
<b>115.73 (e)</b>	<b>Reporting to inmates</b>	
	Does the agency document all such notifications or attempted notifications?	yes
<b>115.76 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.76 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
<b>115.76 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
<b>115.76 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
<b>115.77 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes

	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
<b>115.77 (b)</b>	<b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
<b>115.78 (a)</b>	<b>Disciplinary sanctions for inmates</b>	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
<b>115.78 (b)</b>	<b>Disciplinary sanctions for inmates</b>	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
<b>115.78 (c)</b>	<b>Disciplinary sanctions for inmates</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
<b>115.78 (d)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
<b>115.78 (e)</b>	<b>Disciplinary sanctions for inmates</b>	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
<b>115.78 (f)</b>	<b>Disciplinary sanctions for inmates</b>	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish	yes



	evidence sufficient to substantiate the allegation?	
<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
<b>115.81 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
<b>115.81 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
<b>115.81 (e)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior	yes

	sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	
<b>115.82 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
<b>115.82 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
<b>115.82 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
<b>115.82 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
<b>115.83 (b)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
<b>115.83 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse</b>	

	<b>victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
<b>115.83 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
<b>115.83 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
<b>115.83 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.83 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes

<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
<b>115.86 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.86 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
<b>115.86 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.86 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

<b>115.87 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
<b>115.87 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
<b>115.87 (c)</b>	<b>Data collection</b>	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
<b>115.87 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.87 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
<b>115.87 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
<b>115.88 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	yes

	to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	
<b>115.88 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
<b>115.88 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
<b>115.88 (d)</b>	<b>Data review for corrective action</b>	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
<b>115.89 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
<b>115.89 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
<b>115.89 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.89 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	

	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	yes
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	yes
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
<b>115.403</b>	<b>Audit contents and findings</b>	

<b>(f)</b>		
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes